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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOUGLAS LEE THAYER,

Defendant.

Case No. 2:21-cr-00053-GMN-VCF

**Stipulation for Trial**

The parties, by and through the undersigned, agree as follows:

1. The following Defense exhibits are admissible at trial:

- a. 5004
- b. 5018
- c. 5019
- d. 5020
- e. 5021
- f. 5022
- g. 5023

1 h. 5024

2 i. 5025

3 j. 5027

4 k. 5029

5 l. 5033

6 2. The following Government exhibits are admissible at trial:

7 a. 1a, b, d, f

8 b. 2a

9 c. 3

10 d. 4

11 e. 5

12 f. 6

13 g. 7a, c, d

14 h. 8a, c, e, f

15 i. 9a, b, c, d

16 j. 10a, b, d, e, f

17 k. 11a, b, d

18 l. 12a-c

19 m. 13

20 n. 14c, d, f, g

21 o. 15

22 p. 16a-c

23 q. 18a-c

24 r. 19a-g

s. 20a-q

3. The Government will not make objections solely based on the defense exceeding the scope of the direct examination during cross examination of witnesses that appear on both the Government and Defense witness lists, to the extent that witness is not separately called by the defense.

4. Government witness David Gulick's knowledge, skill, experience, training and education qualify him as an expert in the field of U.S. immigration policies and procedures.

Dated: April 8, 2022

Respectfully submitted,

For the United States:

CHRISTOPHER CHIOU  
Acting United States Attorney

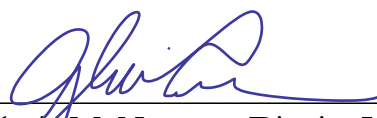
s/ Simon F. Kung  
Simon F. Kung  
Jessica Oliva  
Assistant United States Attorneys

For the Defense:

s/ William Brown  
William Brown, Esq.  
Attorney for Defendant

**IT IS SO ORDERED.**

Dated this 8 day of April, 2022.

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT